

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**CENTERPOINTE RESEARCH
INSTITUTE, INC.**, an Oregon
corporation,

Plaintiff,

v.

MICHAEL SINGLETERRY, an
individual, and **LAW OF ATTRACTION
COACH**, an Oregon sole proprietorship,

Defendants.

Case No. 3:20-cv-00179-HZ

**STIPULATED TEMPORARY
RESTRAINING ORDER**

Plaintiff Centerpointe Research Institute, Inc. (“CRI”) moved for entry of a Temporary Restraining Order and for Order to Show Cause Why a Preliminary Injunction Should Not Enter (the “Motion”) against Defendants Michael Singleterry (“Singleterry”) and Law of Attraction Coach (“LOA Coach,” and together with Singleterry, “Defendants”). ECF 4-6. The parties have stipulated to the entry of this temporary restraining order (“Stipulated Order”). The Court, having considered CRI’s Complaint, Motion, supporting declarations, exhibits, and

memorandum of law filed in support of the Motion, and the terms of this Stipulated Order, finds that:

FINDINGS

By stipulation of the parties, the Court finds as follows:

1. CRI and Defendants have stipulated and agreed to entry of this Stipulated Order without any admission of wrongdoing or violation of law, and without a finding by the Court of law or fact other than stated below.

2. The Court has jurisdiction over the subject matter of this case, and there is good cause to believe it will have jurisdiction over Defendants.

3. Venue in the District of Oregon is proper under 28 U.S.C. § 1391(b)(1) and (2) and LR 3-2.

4. CRI asserts that there is good cause to believe that Defendants have engaged in, and are likely to engage in the future in, acts and practices that violate the Defend Trade Secrets Act, 18 U.S.C. § 1832 to § 1839, and the Oregon Uniform Trade Secrets Act, ORS 646.461 to ORS 646.475, and CRI asserts that it is therefore likely to prevail on the merits of this action. Solely for purposes of this Stipulated Order, Defendants, without waiving their rights and defenses in this action, do not contest CRI's assertions.

5. CRI asserts that there is good cause to believe that immediate and irreparable damage to CRI will ensue if the relief sought in this Stipulated Order is not granted. Solely for purposes of this Stipulated Order, Defendants, without waiving their rights and defenses in this action, do not contest CRI's assertions.

6. CRI asserts that weighing the equities and considering the public interest support the issuance of the relief sought in this Stipulated Order. Solely for purposes of this Stipulated Order, Defendants, without waiving their rights and defenses in this action, do not contest CRI's assertion.

7. CRI asserts that for purposes of working towards an expeditious resolution of this dispute, posting of security pursuant to Federal Rule of Civil Procedure 65(c) is not necessary. Solely for purposes of this Stipulated Order, Defendants, without waiving their rights and defenses in this action, do not contest CRI's assertion.

8. Singleterry has agreed to the entry of this Stipulated Order on the conditions that (i) nothing in or about this Stipulated Order is or should be construed as an admission of any kind by him and (ii) this Stipulated Order will not operate as a determination on the merits of any aspect of CRI's claims.

DEFINITIONS

For purposes of this Stipulated Order, the following definitions shall apply:

1. "CRI Customer Database" refers to CRI's proprietary database containing contact and other information for hundreds of thousands of customers, sales opportunities, and leads, to which Singleterry had access during his employment with CRI.

2. "Other CRI Confidential Information" refers to any other confidential and trade secret information belonging to CRI that Singleterry may currently have in his possession, including, without limitation, sales copy; joint venture partner contact information; CRI's standard operating procedures for marketing and business development campaigns; sales lists of domestic and international purchasers of CRI products and services; and copies, if any, of the products CRI offers for sale, including video products.

PROHIBITED BUSINESS ACTIVITIES

IT IS THEREFORE ORDERED that Defendants, and their officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Stipulated Order by personal service or otherwise, are hereby temporarily restrained and enjoined from:

1. Making any further use or disclosure of the CRI Customer Database and Other CRI Confidential Information, including any information derived from the CRI Customer Database; and

2. Destroying any information, documents or other evidence in any way relating to the allegations in CRI's Complaint, and requiring Defendants to make available for imaging and preserve all hard drives and any other storage medium that contained copies of the CRI Customer Database and Other CRI Confidential Information, including any information derived from the CRI Customer Database.

**PROTOCOL FOR ANALYSIS OF DEFENDANTS' ELECTRONIC DEVICES AND
RETURN OF THE CRI CUSTOMER DATABASE**

IT IS FURTHER ORDERED that not later than February 20, 2020, the parties will schedule a mediation or judicial settlement conference to negotiate a protocol for (1) the analysis of Defendants' electronic devices for conduct relevant to this lawsuit; and (2) the return and/or destruction of all copies in Defendants' possession, custody, or control of the CRI Customer Database, including any information derived therefrom.

DURATION OF STIPULATED ORDER

IT IS FURTHER ORDERED that the Stipulated Order granted herein shall expire 30 days from entry of this Stipulated Order at 11:59 PM (Pacific Time) of the 30th day, unless within such time, for good cause shown, the Stipulated Order is extended, or unless Defendants consent it should be extended for a longer period.

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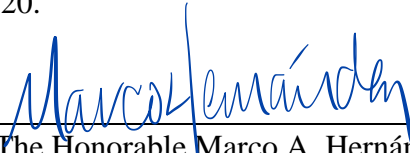
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RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

IT IS SO ORDERED:

DATED this 14 day of February 2020.



The Honorable Marco A. Hernández
United States District Court Judge

STIPULATED TO BY:

PERKINS COIE LLP

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